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Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *The Use of N11 Codes and Other Abbreviated Dialing Arrangements,*
*CC Docket No. 92-105***

Dear Ms. Dortch:

The purpose of this ex parte submission is to explain why the Commission should expressly confirm that carriers may recover their costs in implementing any N11 or other abbreviated dialing solution. This letter also explains why #344 should be rejected as a possible option.

Carriers Should Be Allowed to Recover their Costs.

The Commission should clearly state in the forthcoming order in this docket that carriers are entitled to recover all costs they incur in implementing an N11 or other abbreviated dialing solution. As the NANC stated, carriers will incur network upgrade costs in at least six areas: network element development; operations support systems; billing systems; operations expense; negotiation with One Call centers; and preparation of contracts or tariffs for use with One Call centers. NANC Report on Abbreviated Dialing at 11 (Oct. 29, 2003). SBC estimated that it would spend \$3.25–\$5.25 million implementing an N11 solution. SBC Comments at 6. And Verizon's preliminary estimates are consistent with SBC's. In addition to these network costs, carriers will also incur costs providing the ongoing N11 service itself to One Call centers. As the NANC stated, in the proposed N11 model, "the One Call Centers would be customers of the LECs providing the service and reimbursing them per service agreements after the cost of preparing the network is completed." *Id.* at 12. But "the cost of implementing this service [must] not be an unfunded mandate." *Id.* at 11. Nor should the Commission require carriers to perform network upgrades or other related work without expressly authorizing them to recover their costs to comply with whatever abbreviated dialing solution the Commission selects.

#344 Should Be Rejected as a Possible Solution.

Verizon agrees with the NANC that #344 should not be selected as an abbreviated dialing solution for use by One Call Centers. The NANC identified many major problems associated with such a solution:

1. As the NANC stated, "the use of access codes involving the Star or Number Sign is inconsistent with existing numbering plan definitions, and use of these characters would be difficult to implement in most wireline architectures." *Id.* at 7. Verizon agrees with the NANC that "the use of Number Sign and Star are not considered viable alternatives for access to One Call Centers." *Id.*

2. In addition, codes using the star or number sign would not achieve the uniformity mandated by the Act since all users would not be dialing the same sequence. *Id.* Rotary telephones do not include an alternative for the number sign, and the option of dialing 1-1 for star is not widely known by the public. *Id.* at 7-8.

3. Many PBX systems use the star and/or number sign for feature access. Re-programming these systems may not always be possible and would involve “considerable customer expense.” *Id.* at 8.

4. Some switching systems are not capable of processing the star and number sign in the dialing sequence. *Id.* The necessary switch development, particularly on legacy systems slated for retirement, would delay full implementation of the One Call functionality and, as the NANC found, would “add considerable expense.” *Id.*

5. Because #XXX codes have never been defined in the North American Numbering Plan, considerable numbering standards and development work would be necessary to implement a #344 solution. *Id.* at 6.

6. Since the advent of touch tone dialing, the # key has been used as a network control character to stop switch timing and immediately process the call. *Id.* The # key is also used by operator services switching systems to re-originate a credit card call with the same billing information used in the preceding call. *Id.* In addition, the # key is used for control in connected systems, such as voice mail. *Id.* These uses would need to be modified before any implementation could begin. *Id.*

7. In at least one wireline carrier’s service area, #344 is used as a group speed call number, and #34 is used as a special feature activation code for call forwarding. *Id.* Both are part of the carrier’s standard dialing plan and would require a dialing plan change in the service area, which would be directly affect customers, to eliminate the conflict. *Id.* at 6-7.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne D. Burkot". The signature is fluid and cursive, with a large, stylized "A" and "B".

cc: Scott Bergmann
Matt Brill
Dan Gonzalez
Chris Libertelli
Jessica Rosenworcel
Narda Jones
Regina Brown
Cheryl Callahan
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Marilyn Jones